

PATRICK D. ROBBINS (CABN 152288)
Acting United States Attorney
450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495
Telephone: (415) 436-7200
Fax: (415) 436-6748

ERIC HAMILTON (CABN 296283)
Deputy Assistant Attorney General
DIANE KELLEHER

Branch Director

CHRISTOPHER HALL

Assistant Branch Director

ANDREW W. BERNIE

ALEXANDER W. RESAR

Trial Attorneys

U.S. DEPARTMENT OF JUSTICE

Civil Division, Federal Programs Branch

1100 L Street, NW
Washington, DC 20005
Telephone: (202) 616-8188
alexander.w.resar@usdoj.gov

Counsel for Defendants

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

AMERICAN FEDERATION OF
GOVERNMENT EMPLOYEES, *et al.*

Plaintiffs,

v.

DONALD J. TRUMP, in his official capacity as
President of the United States, *et al.*,

Defendants.

Case No. 3:25-cv-03698-SI

NOTICE OF COMPLIANCE

1 As directed by the Court at the hearing held on June 4, 2025, Defendants respectfully
2 submit the following notice of compliance and accompanying declarations detailing the steps
3 that the United States Department of State (State) and the United States Department of Housing
4 and Urban Development (HUD) have taken in compliance with this Court's Temporary
5 Restraining Order, ECF No. 85, and Preliminary Injunction, ECF No. 124.
6

7 The declaration of Lori A. Michalski, Chief Human Capital Officer at HUD, addresses
8 HUD's decision to terminate 76 of 312 probationary employees and the legal bases for those
9 terminations. As detailed in Ms. Michalski's declaration, HUD's termination of 76 of 312
10 probationary employees was not pursuant to or to implement, and was entirely independent from,
11 sections 3(c) and 3(e) of Executive Order 14210 and the February 26, 2025, OMB/OPM
12 Memorandum.
13

14 The declaration of Daniel Holler, Deputy Chief of Staff to the Secretary of State,
15 addresses actions taken by Secretary of State Marco Rubio to reform the agency's operations and
16 footprint to better reflect the current administration's diplomatic priorities and the needs of
17 modern diplomacy. As detailed in Mr. Holler's declaration, State's intended reorganization was
18 directed by Secretary Rubio and intended to address foreign policy needs, not to respond to any
19 Executive Order.
20
21
22
23
24
25
26
27
28

1 Dated: June 9, 2025

Respectfully submitted,

2 PATRICK D. ROBBINS (CABN 152288)
3 Acting United States Attorney
4 U.S. ATTORNEY'S OFFICE
450 Golden Gate Avenue, Box 36055
San Francisco, California 94102-3495

5 ERIC HAMILTON
Deputy Assistant Attorney General

6 DIANE KELLEHER
Branch Director

7 CHRISTOPHER HALL
8 Assistant Branch Director

9 /s/ Alexander W. Resar
10 ANDREW M. BERNIE
11 ALEXANDER W. RESAR
12 Trial Attorneys
13 U.S. DEPARTMENT OF JUSTICE
Civil Division, Federal Programs Branch
1100 L Street, NW
Washington, DC 20005

14 *Counsel for Defendants*